

**IN THE UNITED STATES DISTRICT
COURT FOR THE EASTERN DISTRICT
OF TEXAS MARSHALL DIVISION**

SAINT LAWRENCE COMMUNICATIONS LLC	§ § §	Case No. 2:15-cv-000349-JRG (Lead Case)
--	-------------	--

Plaintiff,

Jury Trial Requested

v.

**ZTE CORPORATION, ZTE USA, INC.,
and ZTE (TX) INC.,**

Defendant,

SAINT LAWRENCE COMMUNICATIONS LLC	§ § §	Case No. 2:15-cv-000351-JRG (Consolidated Case)
--	-------------	--

Plaintiff,

Jury Trial Requested

v.

MOTOROLA MOBILITY LLC,

Defendant,

NOTICE OF COMPLIANCE
REGARDING DEFENDANTS' LETTER BRIEF

In compliance with the Court's Docket Control Order entered in this matter on February 24, 2016 [Dkt. 100], Defendants Motorola Mobility LLC, ZTE USA, Inc., and ZTE (TX) Inc., file this Notice of their letter to the Court requesting permissions to file a motion for summary judgment that certain claims are invalid under 35 U.S.C. § 112, ¶ 2. A copy of the letter is attached as Exhibit 1.

DATED: July 6, 2016

Respectfully submitted,

/s/ Joseph M. Drayton

Joseph M. Drayton (Lead counsel)
NY Bar No. 2875318
jdrayton@cooley.com
Cooley LLP
The Grace Building
1114 Avenue of the Americas
46th Fl.
New York, NY 10036-7798
Tel: 212-479-6000
Fax: 212-479-6275

Michael Rhodes
CA Bar No. 116127
mrhodes@cooley.com
Cooley LLP
101 California St., 5th Fl.
San Francisco, CA 94111-5800
Tel: 858-550-6000
Fax: 858-550-6420

Drew Koning (*pro hac vice*)
CA Bar No. 263082
dkoning@cooley.com
Cooley LLP
4401 Eastgate Mall
San Diego, CA 92121
Tel: 858-550-6129
Fax: 858-550-6420

Rose S. Whelan
DC Bar No. 999367
rwhelan@cooley.com
Cooley LLP
1299 Pennsylvania Ave, NW
Washington, DC 20004-2400
Tel: 202-842-7800
Fax: 202-842-7899

Deron R. Dacus
Texas Bar No. 00790553
ddacus@dacusfirm.com
Peter A. Kerr
Texas Bar No. 24076478

pkerr@dacusfirm.com
The Dacus Firm LLP
821 ESE Loop 323, Suite 430
Tyler, TX 75701
Tel: 903-705-1117
Fax: 903-581-2543
Email: ddacus@dacusfirm.com

Attorneys for Defendant
MOTOROLA MOBILITY LLC

By: /s/ Eric H. Findlay
Eric H. Findlay
State Bar No. 00789866
Brian Craft
State Bar No. 04972020
FINDLAY CRAFT, P.C.
102 N. College Avenue, Suite 900
Tyler, TX 75702
Telephone: 903.534.1100
Facsimile: 903.534.1137
efindlay@findlaycraft.com
bcraft@findlaycraft.com

Lionel M. Lavenue, Esq. (Lead Counsel)
lionel.lavenue@finnegan.com
FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.
Two Freedom Square
11955 Freedom Drive
Reston, VA 20190-5675
Telephone: (571) 203-2700
Facsimile: (202) 408-4400

Shaobin Zhu, Esq.
shaobin.zhu@finnegan.com
FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.
Mirae Asset Tower
28/F, Unit A-B
No. 166 Lujiazui Ring Road, Pudong
Shanghai, P.R. China 222120
Telephone: (650) 521-3338
Facsimile: (202) 408-4400

Shaton C. Menzie, Esq.
shaton.menzie@finnegan.com
FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.
271 17th Street N.W., Suite 1400
Atlanta, GA 30363-6209
Telephone: (404) 653-6435
Facsimile: (202) 408-4400

Counsel for Defendants ZTE (USA), Inc.
and ZTE (TX), Inc.

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a) on this 6th day of July 2016. As such, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A).

/s/ Joseph M. Drayton
Joseph M. Drayton